

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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ROBERT P. GOODRICH, )  
Petitioner, )  
v. ) Civil Action No. 03-12541-NG  
TIM HALL, )  
Respondent. )  
\_\_\_\_\_  
)

**PETITIONER'S MOTION FOR ENLARGEMENT OF TIME  
TO FILE REPLY MEMORANDUM IN SUPPORT OF ISSUANCE OF  
WRIT OF HABEAS CORPUS  
(ASSENTED-TO)**

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Petitioner Robert P. Goodrich ("Petitioner") hereby moves that the Court enlarge the time for filing his Reply Memorandum in Further Support of Issuance of Writ of Habeas Corpus for an additional week, to and including Friday, October 22, 2004. As grounds therefor, Petitioner states that the Commonwealth's opposition raises complex issues of law and presents numerous defenses to Petitioner's Petition. Petitioner, who presently seeks relief from a minimum ten-year sentence, requests that this Court provide him with additional time to comprehensively research his arguments in his Reply Memorandum. In further support of his motion, the Commonwealth has assented to the requested enlargement of time.

Respectfully submitted,

ROBERT P. GOODRICH,  
By his attorneys,



Peter E. Gelhaar (BBO# 188310)  
Jill L. Brenner (BBO# 652501)  
Donnelly, Conroy & Gelhaar, LLP  
One Beacon Street, 33<sup>rd</sup> Floor  
Boston, MA 02108  
(617) 720-2880

Dated: October 14, 2004

**LOCAL RULE 7.1 CERTIFICATION**

I hereby certify that on October 14, 2004, I did confer in good faith, via telephone, with Maura D. McLaughlin, Esq., counsel for Respondent, in an effort to narrow or resolve the issues raised in this motion, and counsel for Respondent has indicated that she assents to this motion.



Jill L. Brenner